Case 23-10831-MFW Doc 249-1 Filed 08/15/23 Page 1 of 3

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
Lordstown Motors Corp., et al.,1) Case No. 23-10831 (MFW)
Debtors.) (Jointly Administered)
))

ORDER SHORTENING NOTICE AND OBJECTION PERIODS FOR DEBTORS' "DEBTORS' MOTION UNDER BANKRUPTCY RULE 9019 FOR ENTRY OF AN ORDER APPROVING THE SETTLEMENT BY AND AMONG THE DEBTORS AND KARMA AUTOMOTIVE LLC"

Upon the motion, dated August 15, 2023 (the "Motion to Shorten")² of the above-captioned debtors and debtors in possession (the "Debtors") for entry of an order (this "Order") pursuant to Bankruptcy Rule 9006 and Local Rule 9006-1 scheduling a hearing and shortening the notice periods for the Debtors' Motion Under Bankruptcy Rule 9019 For Entry of An Order Approving the Settlement By and Among the Debtors and Karma Automotive LLC (the "Settlement Motion"), all as more fully described in the Motion to Shorten; and the Court having jurisdiction to consider the Motion to Shorten and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware dated as of February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used, but not otherwise defined, herein shall have the respective meanings ascribed to them in the Motion to Shorten.

found that venue of this proceeding and the Motion to Shorten in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that notice of the Motion to Shorten has been given and is sufficient and adequate under the circumstances and that no other or further notice is necessary; and the Court having determined that there is good and sufficient cause to grant the relief in the Motion to Shorten,

IT IS HEREBY ORDERED THAT:

- 1. The Motion to Shorten is GRANTED as set forth herein.
- 2. The Settlement Motion shall be heard at the Hearing on August _______, 2023 starting at _______.m. (Eastern Daylight Time).
- 4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.